FILED
Clerk
U.S. Bankruptcy Court
JUL 28 2017
WDNC
Statesville, NC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

In re:		
Sandra Dee Cole	)	Case No. 16-50322
	)	
	)	Chapter 7
SSN: XXX-XX-2275 Debtor.	)	

MOTION TO AMEND SCHEDULE C OF PETITION

Debtor respectfully moves the Court for an order granting permission to amend Schedule C of her Petition in the above captioned case, and as grounds therefore, respectfully shows:

1. The Debtor initially filed a Chapter 13 petition on May 25, 2016 and Stephen G. Tate was assigned as the Chapter 13 Trustee.

2. The first 341(a) meeting was held June 21, 2016 however the case was subsequently converted to a Chapter 7 in August, 2016 and John W. Taylor was assigned as the Chapter 7 Trustee ("Trustee"). The 341(a) meeting for the Chapter 7 case was held on August 18, 2016.

3. At the time the Debtor filed her bankruptcy petition she was not aware that she was named on a joint checking account with her non-filing husband, to wit: Plain's Capital Bank Checking Acct No ending 2046 ("Checking Account"). This checking account was opened by Debtor's husband several years ago for deposit of his Veteran's Disability payments.

4. Although the money deposited into this account was not the property of the Debtor, in the interests of transparency and in furtherance of her obligations as a Chapter 7 debtor, the Debtor has amended Schedule B to include this Checking Account.

5. At the time the bankruptcy petition was filed, there was $2,597 in this joint checking account.

6. Although the money deposited into this account was not hers, the Debtor would like to use the wild card exemption to exempt a ½ interest in this account as to avoid any potential claims for non-exempt equity.

7. The time had passed which would freely allow the amendment of Schedule C without leave of Court.

WHEREFORE, pursuant to local Rule 4003-1 and Rule 1009(a) of the Federal Rules of Bankruptcy Procedure, Debtor prays the Court to Enter an Order granting Debtor permission to amend Schedule C of her Chapter 7 Petition, to use any available wild card exemption to protect potential equity in the joint checking account and for such other and further relief as the Court deems just and proper.

This the 28th day of **July, 2017.**

Sandra Dee Cole

Sandra Dee Cole, Debtor
143 Sleepy Cover Trail
Mooresville, NC 28117

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

In re: **Sandra Dee Cole**	)	Ch 7 Case No. **16-50172**
	)	
	)	**NOTICE OF OPPORTUNITY FOR HEARING**
SSN: XXX-XX-2275 Debtor.	)	(No Protest Notice: No hearing will be held unless requested)
	)	

TAKE NOTICE that the undersigned Debtor has filed a Motion with the Court to Amend Schedule C of her bankruptcy petition. A copy of these papers are included with this Notice.

Your rights may be affected. You should consult with your attorney to discuss this matter.

If you do not want the court to order the Motion, or if you want the Court to consider your views on the Motion, then on or before 15 days from the date of this Notice, **you or your attorney must do three things:**

1. File with the Court a written response requesting that the court hold a hearing and explaining you position. File your response at:

U.S. Bankruptcy Court
401 West Trade Street
Charlotte, NC 28202

2. On or before the date stated above for written responses, you must also mail or fax a copy of your written request to:

Sandra Dee Cole
143 Sleepy Cove Trail
Mooresville, NC 28117

John W. Taylor, Trustee
John W. Taylor, P.C.
4600 Park Road, Suite 420
Charlotte, NC 28209
(704) 540-3622 x 102 (ph)
(704) 540-3623 (fax)

3. **If a hearing is requested, it will be held on September 8th, 2017 at 11:00 a.m.**, at Courtroom 1-5, Charles Jonas Federal Building, 401 West Trade Street, Charlotte, North Carolina, 28202.

If you or your attorney do not take these steps a hearing will not be held, and the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

This the 28 **th** day of **July, 2017.**

Sandra Dee Cole

Sandra Dee Cole, Debtor
143 Sleepy Cover Trail
Mooresville, NC 28117

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

In re: Sandra Dee Cole	))	Case No. 16-50322
SSN: XXX-XX-2275 Debtor.	))	Chapter 7

CERTIFICATE OF SERVICE

I, Sandra Dee Cole, certify that a service of a copy of the debtor's ***Motion to Amend Schedule C*** was served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid with sufficient postage thereon to:

John W. Taylor, Trustee
4600 Park Road, Suite 420
Charlotte, NC 28209

U.S. Bankruptcy Administrator
402 West Trade Street, Suite 200
Charlotte, NC 28202

Moon Wright & Houston, PLLC
Attn: Richard S. Wright , Esq
121 West Trade Street, Suite 1950
Charlotte, North Carolina 28202

and all the parties listed on the annexed mailing matrix exhibit.

This is the 28 **th** day of **July, 2017**

Sandra Dee Cole

Sandra Dee Cole, Debtor
143 Sleepy Cover Trail
Mooresville, NC 28117

Label Matrix for l[illegible]
0419-5
Case 16-50322
Western District of North Carolina
Statesville
Thu Aug 25 12:08:58 EDT 2016

Moon Wright & Houston, PLLC
227 West Trade Street
Suite 1800
Charlotte, NC 28202-2665

[illegible]
Statesville Division
200 West Broad Street
Room 100 1st Floor
Statesville, NC 28677-5258

American Express
Attn: Corp Officer
PO Box 981535
El Paso, TX 79998-1535

American Express
Attn: Corp Officer
PO Box 297871
Fort Lauderdale, FL 33329-7871

American Express Centurion Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Bank Of America Home Loans
Attn: Corp Officer
PO Box 31785
Tampa, FL 33631-3785

Bank of America
Attn: Corp Officer
PO Box 27052
Tampa, FL 33623-7052

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

CMC - NorthEast
Attn: Corp Officer
Patient Accounting Services
270 Copperfield Blvd., Suite 11
Concord, NC 28025-2442

Capital One
Attn: Corporate Officer
P.O. Box 30285
Salt Lake City, UT 84130-0285

Capital One/Kohls
Attn: Corp Officer
PO Box 3043
Milwaukee, WI 53201-3043

Carolinas Healthcare System
Attn Patient Accounts, PIF
Attn: Corp Officer
PO Box 32861
Charlotte, NC 28232-2861

Carolinas Medical Center
Attn: Corp Officer
PO Box 32861
Charlotte, NC 28232-2861

Chex Systems, Inc.
Attn: Consumer Relations
7805 Hudson Road
Suite 100
Saint Paul, MN 55125-1703

Comenity Bank/Victorias Secret
ATTN: Corp Officer
Bankruptcy Department
PO Box 182125
Columbus, OH 43218-2125

Copeland Richards
Attn: Corp Officer
215 S. Main St., Ste. 301
Davidson, NC 28036-8039

David DiMatteo
Moon, Wright & Houston, PLLC
227 W. Trade Street, Suite 1800
Charlotte, NC 28202-2665

Dish Network Corp.
Attn. Corporate Officer
9601 S. Meridian Blvd
Englewood, CO 80112-5905

Founders Federal Credit Union
Attn: Corp Officer
737 Plantation Road
Lancaster, SC 29720-5808

IRS
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
P.O. Box 7317
Philadelphia, PA 19101-7317

Iredell County Clerk of Court
221 E. Water Street
Statesville, NC 28677-5229

Iredell County Tax Collector
Attn: Corporate Officer
P.O. Box 1027
Statesville, NC 28687-1027

Key Bank
Attn. Corporate Officer
24600 Chagrin Blvd
Beachwood, OH 44122-5666

Key Bank
Attn: Corp Officer
PO Box 94825
Cleveland, OH 44101-4825

Lake Norman Regional Medical Center
Attn: Corporate Officer
171 Fairview Road
PO Box 3250
Mooresville, NC 28117-3250

Mecklenburg County Clerk of Court
832 E. 4th St
ATTN: 15-CVS-1619
Charlotte, NC 28202-2810

Medical Data Systems
Attn: Corp Officer
645 Walnut Street
Ste 5
Gadsden, AL 35901-4173

Medicredit Corporation
Attn: Corporate Officer
13730 South Point Boulevard
Charlotte, NC 28273-7715

Medicredit, Inc.
Attn: Corp Officer
PO Box 1629
Maryland Heights, MO 63043-0629

[illegible]
Attn: Corp Officer
227 W. Trade St. Suite 1800
Charlotte, NC 28202-2665

NC Dept of Revenue
Central Collection Unit
PO Box 1168
Raleigh, NC 27602-1168

North Carolina Department of Revenue
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

Novant Health
Attn: Corp Officer
PO Box 11549
Winston Salem, NC 27116-1549

PMAB, LLC
Attn. Corporate Officer
PO Box 12150
Charlotte, NC 28220-2150

Piedmont HealthCare
Attn: Corporate Officer
PO Box 1845
Statesville, NC 28687-1845

Receivables Performance Mgmt
Attn: Corp Officer
PO Box 1548
Lynnwood, WA 98046-1548

Synchrony Bank/JCP
Attn:Corp Officer
PO Box 965007
Orlando, FL 32896-5007

Target Card Services
Attn. Corporate Officer
PO Box 673
Minneapolis, MN 55440-0673

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

Wells Fargo Bank
Attn: Corp Officer
PO Box 10347
Des Moines, IA 50306-0347

Wells Fargo Home Mortgage
Attn: Corp Officer
P.O. Box 10335
Des Moines, IA 50306-0335

Zurich NA
Attn: Corporate Officer
1400 American Lane
Tower 2, Floor 5
Schaumburg, IL 60196-5452

Danielle J. Brudi
Collum Perry PLLC
109 W. Statesville Ave.
Mooresville, NC 28115-2213

John W. Taylor
John W. Taylor, P.C.
4600 Park Road
Suite 420
Charlotte, NC 28209-3705

Sandra Dee Cole
143 Sleepy Cove Trail
Mooresville, NC 28117-9413

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank of America
Attn: Corporate Officer
PO Box 982235
El Paso, TX 79998-2235

US Bank
Attn: Corp Officer
PO Box 5227
Cincinnati, OH 45201

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank National Association

End of Label Matrix	
Mailable recipients	46
Bypassed recipients	1
Total	47